

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: WILLIAM LEE DAVIS
DEBTOR**

**CHAPTER 13
CASE NO. 16-13890 JDW**

MOTION TO SUSPEND CHAPTER 13 PLAN PAYMENTS

COMES NOW, William Lee Davis (“Debtor”) by and through his attorney of record, and states as follows:

1. That Debtor filed a voluntary petition for relief under Chapter 13 of Title II of the United States Bankruptcy Code on November 2, 2016.
2. The Debtor lost his job in November, 2018. He has several promising leads on new employment but would request a suspension of payments for the months of November, 2018, through January, 2018, until he becomes gainfully employed.
3. There is no mortgage payment in the Debtor’s Chapter 13 plan.
4. The Debtor request that any and all money received by the Trustee during the suspended months be refunded to the Debtor and payments for the suspended months be re-amortized into his Chapter 13 Plan.

WHEREFORE, PREMISES CONSIDERED, Debtor moves this Honorable Court to enter an order suspending Debtor’s Chapter 13 plan payments for the months of November, 2018, through January, 2019, and for such further and general relief to which the Debtor may be entitled.

Dated: December 11, 2018

RESPECTFULLY SUBMITTED,

/s/Robert H. Lomenick
KAREN B. SCHNELLER, MSB 6558
ROBERT H. LOMENICK, JR., MSB 104186
SCHNELLER & LOMENICK, P.A.

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ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

I, Robert H Lomenick/Karen B. Schneller, Attorney for the Debtor, do hereby certify that I have this day mailed, by United States mail, postage prepaid, or sent via the Court's ECF system by electronic mail, a true and correct copy of the above and foregoing Motion to Suspend Chapter 13 Plan Payments to the following:

**Chapter 13 Trustee Locke D. Barkley – sbeasley@barkley13.com
The Office of the U.S. Trustee – USTRegion.05.AB.ECF@usdoj.gov
And the Attached List of Creditors.**

SO CERTIFIED: December 11, 2018

/s/ Robert H Lomenick, Jr.
ATTORNEY FOR DEBTOR